

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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TELECOM BUSINESS SOLUTION, LLC, <i>et al.</i> ,	: Civil Action No.: 1:22-cv-01761
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Petitioners,	: Judge Lewis A. Kaplan
	:
v.	: Magistrate Judge Robert W.
	: Lehrburger
TERRA TOWERS CORP., <i>et al.</i> ,	:
	:
Respondents.	:
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**ORDER TO SHOW CAUSE FOR CIVIL CONTEMPT SANCTIONS,  
PRELIMINARY INJUNCTION AND TEMPORARY RESTRAINING ORDER**

Upon the Declaration of Katherine M. Poldneff, sworn to the 20<sup>th</sup> day of May, 2025, the Declaration of Ana Lucía Alejos Botrán verifying certain facts in independent Company counsel Adam Schachter’s letter dated May 19, 2025 (the “Company’s Letter,” attached as Ex. 12 to the Poldneff Declaration), sworn to the 19<sup>th</sup> day of May, 2025, and the Declaration of Jorge Gaitán further verifying certain facts in the Company’s Letter, sworn to the 20<sup>th</sup> day of May, 2025, and upon the copy of the Memorandum of Law in Support of Petitioners’ Motion for Further Civil Contempt Sanctions and Emergency Injunctive Relief filed herewith (the “Motion”), it is ORDERED, that the Respondents show cause before a motion term of this Court, at Room 21B, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, in the City, County and State of New York, on May \_\_\_\_\_, 2025, at \_\_\_\_\_, or as soon thereafter as counsel may be heard, why an order should not be issued (i) finding that Respondents are in further contempt of this Court’s order confirming the First Partial Final Award issued in the arbitration underlying this action (ECF 124), (ii) ordering Respondents to purge that contempt, and (iii) pursuant to Rule 65 of the Federal Rules of Civil Procedure, enjoining: (1) Respondents; (2) Respondents’ officers, agents, servants,

employees, and attorneys; and (3) other persons who are in active concert or participation with anyone described in (1) and (2) during the pendency of this action from the conduct described in the proposed order filed herewith (the “Proposed Order”); and it is further

ORDERED that, sufficient reason having been shown therefor, pending the hearing of Petitioners’ application for civil contempt sanctions and a preliminary injunction, pursuant to Rule 65, Fed. R. Civ. P., the (1) Respondents; (2) Respondents’ officers, agents, servants, employees, and attorneys; and (3) other persons who are in active concert or participation with anyone described in (1) and (2), are temporarily restrained and enjoined pursuant to the Proposed Order; and it is further

ORDERED that the Court finds, for substantially the same reasons as set forth in the Motion, that Petitioners are not required to give security; and it is further

ORDERED that Respondents, as parties to this case, are deemed to be in receipt of good and sufficient service of this Order to Show Cause for Preliminary Injunction and Temporary Restraining Order.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

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Hon. Lewis A. Kaplan

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